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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

A.J.P. and A.M.P., minors by and
through their guardian ad litem Cynthia
Nunez, individually and as successor in
interest to Albert Perez, deceased; and
PATRICIA RUIZ, individually,

Plaintiffs,

v.

COUNTY OF SAN BERNARDINO;
DAVID MOORE, CORY MCCARTHY,
CHRISTINA OLIVAS, ANDREW
POLLICK, and DOES 5-10, inclusive,

Defendants.

Case No. 5:22-CV-01291 SSS (SHKx)
Hon. Judge Sunshine S. Sykes,
Hon. Mag. Shashi H. Kewalramani

**STATUS REPORT RE:
SETTLEMENT**

*[Proposed] Order Filed Concurrently
Herewith*

1 **TO THIS HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN A.J.P. and A.M.P.,
3 minors by and through their guardian ad litem CYNTHIA NUNEZ, individually and
4 as successor in interest to ALBERT PEREZ, deceased; and PATRICIA RUIZ,
5 individually ("Plaintiffs") and COUNTY OF SAN BERNARDINO; CORY
6 MCCARTHY, ANDREW POLLOCK; DAVID MOORE, and CRISTINA OLIVAS
7 ("Defendants"), by and through their attorneys of record, hereby inform the Court of
8 the status of the settlement of this entire matter, and respectfully request that the
9 Court maintain jurisdiction over the case until the consummation of the settlement,
10 and stipulate as follows:

11 WHEREAS, the Court approved the Minors' Compromises on August 5,
12 2024 (See Dkt. No. 60).

13 WHEREAS, the County is in the process of purchasing the structured
14 annuities for the minors A.J.P. and A.M.P. and will do so consistent with this
15 Court's Order, dated August 5, 2024 and prior to the rate expiration date of
16 September 10, 2024.

17 WHEREAS, the County is in the process of issuing the remainder of the
18 settlement funds to Plaintiffs and their attorneys.

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1 WHEREAS, the parties further request that the Court maintain jurisdiction
2 over this action for forty-five (45) days to allow time for the parties to complete the
3 consummation of the terms of the settlement, including payment of the settlement
4 funds.

5 WHEREAS, based on the above, good cause exists for granting the parties'
6 stipulation.

7 IT IS SO STIPULATED.

8
9 Respectfully submitted,

10 DATED: August 19, 2024

LAW OFFICES OF DALE K. GALIPO

11
12 By /s/ Dale K. Galipo

13 Dale K. Galipo
14 Shannon J. Leap¹
15 Attorneys for Plaintiffs

16 DATED: August 19, 2024

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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19 By /s/ Kayleigh A. Andersen

20 Eugene P. Ramirez, Esq.
21 Lynn Carpenter, Esq.
22 Kayleigh A. Andersen, Esq.
23 Attorneys for Defendants, COUNTY OF
24 SAN BERNARDINO, et al.

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27 ¹ As the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.